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May 18, 2022

**VIA ECF**

Honorable Sarah L. Cave, U.S.M.J.  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Amilcar Escobar v. Randa Accessories Leather Goods, LLC**  
**Docket No.: 21-CV-9061 (AJN) (SLC)**

Dear Judge Cave:

My name is Stephen Mc Quade, Esq., and I am Senior Counsel with the law firm of Pitta LLP, attorneys for Amilcar Escobar (“Plaintiff”) in the above-referenced matter in his claims against Randa Accessories Leather Goods, LLC (“Defendant”) (collectively, “Parties”).

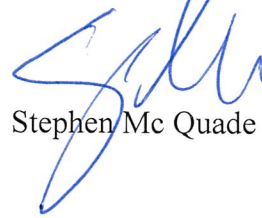
In conformance with Section I(A) of Your Honor’s Individual Practices in Civil Cases and with Your Memo Endorsement, dated March 21, 2022 (*see* Dkt. 22) , I write to update the Court regarding the court-ordered mediation process, in furtherance of Report of Rule 26(f) Conference and Case Management Plan, dated January 4, 2022. (*See* Dkt. 15). Additionally, the instant correspondence is being submitted jointly by counsel for the Parties.

Several days prior to the mediation session with Ms. Karen Artz Ash, Esq (“Mediator”), the Parties submitted *Ex-Parte* Pre-Mediation Statements to the Mediator. Then, on May 11, 2022, the Parties participated in a mediation session that lasted approximately five hours. At the conclusion of this mediation session, the Mediator indicated that progress had been made, and that she desired to continue this conciliatory process. It is possible that there will be additional calls with the Mediator to continue discussions but, to date, there have been no follow-up calls definitively scheduled with the Parties and/or their respective counsel. Accordingly, the Parties are continuing with the litigation schedule at this time.

To that end, the Parties have exchanged discovery demands and responses thereto. Further, the Parties are also in the process of scheduling depositions of the respective principal witnesses for the Parties, which are tentatively scheduled for June 2022.

The undersigned thanks the Court for the time and attention to the issue presented herein.

Respectfully submitted,



Stephen Mc Quade

cc: Noah H. Bunzl, Esq., Counsel for Defendant (*via ECF*)